

# SAN BUENAVENTURA RESEARCH ASSOCIATES

MEMORANDUM

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**To:** Megan Jones, Rincon Consultants, Inc.  
**From:** Mitch Stone, San Buenaventura Research Associates  
**Date:** 25 February 2014  
**Re:** 1170 Signal Hill Road, Pebble Beach (County of Monterey) Historic Resources Review

## 1. Purpose of Report

The purpose of this report is to provide the County of Monterey with an independent professional analysis of the historical significance and eligibility of the property located at 1170 Signal Hill Road in Pebble Beach. The property consists of a residence constructed in 1958, for which an application for demolition has been filed by the property owner. Commonly known as the Connell House, it was designed by the Los Angeles architect Richard J. Neutra. [Figure 1]

The proposal to demolish this residence has been the subject of an unusually large number of reports authored by historic resources consultants, beginning in October 2010, and continuing through November 2013. These reports come to sharply divergent conclusions with respect to the significance and eligibility of the property, and accordingly, in their conclusions regarding whether it should be considered a historic resource for purposes of CEQA. In addition, the County of Monterey is in receipt of numerous opinions from nonprofessionals that will also be considered in this report.

In accordance with our scope of work, SBRA has reviewed all prior reports, responses, and correspondence provided by staff. From these we have identified twenty-three that we believe are the key documents related to this property, and should be regarded as expert findings or relevant opinions bearing on significance and eligibility. These reports are identified in chronological order and summarized in the table below. For the sake of consistency, these reports will be referenced in this report by the author and date, as below (year, followed by month and day).

It should be understood that reconciling all of these findings and opinions is not the goal of this report, as it is not the purpose or a requirement of CEQA to establish one, authoritative opinion about the significance of any given resource. Further, SBRA was not tasked with the gathering of additional historical data, but rather was asked to determine if the data presently available provides a sufficient basis for determining significance and eligibility.

Date of Report	Author of Report	Summary of Topic, Findings or Opinion
2010-10-15	Anthony Kirk	DPR 523 forms constituting a Phase I Historic Resources Report. Finding of eligibility for the CRHR under Criterion 3.
2011-02-10	Michael Burns	Discussion of mitigation and <i>Secretary of the Interior's Standards</i> .



Figure 1. Project Location [Source: USGS 7.5' Quadrangle, Monterey, CA, 1947 rev. 1983]

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<b>Date of Report</b>	<b>Author of Report</b>	<b>Summary of Topic, Findings or Opinion</b>
2011-04-07	Circa: Historic Property Development (Sheila McElroy)	Recommended mitigation measures.
2011-07-05	Bill Bernstein	Recommended mitigation measures, opinion with respect to architectural merit (negative).
2011-08-04	Monterey County Historic Resources Review Board (HRRB)	Minutes of meeting of 8-4-2011. Finding of eligibility for the CRHR under Criterion 3.
2011-10-14	Circa: Historic Property Development (Sheila McElroy)	Response to action and findings of HRRB. Finding of ineligibility under CRHR under Criterion 3.
2011-11-16	Thomas Hines	Opinion with respect to architectural merit (positive).
2011-12-06	Circa: Historic Property Development (Sheila McElroy)	Finding of ineligibility under Monterey County Criteria for Evaluation.
2011-12-15	John Bridges	Opinion with respect to eligibility, suggested mitigation measures.
2012-01-23	Dion Neutra	Opinion with respect to architectural merit (positive).
2012-02-01	Barbara Lamprecht	Opinion with respect to architectural merit (positive).
2012-03-12	Anthony Kirk	Response to Circa and Bernstein. Finding of eligibility under CRHR under Criterion 3.
2012-04-19	Robert Chattel	Finding of ineligibility under CRHR under Criterion 3.
2012-05-18	Circa: Historic Property Development (Sheila McElroy)	Windshield survey of Pebble Beach.
2012-06-07	Paul Adamson	Opinion with respect to suggested mitigation measures.
2012-07-11	Circa: Historic Property Development (Sheila McElroy)	Windshield survey of Pebble Beach, additional discussion.
2012-08-09	John Bridges	Opinion with respect to suggested mitigation measures.
2013-03-07	Tim Kelley	Opinion with respect to suggested mitigation measures.
2013-07-15	Meg Clovis	Overview of submitted reports and opinion with respect to eligibility for the CRHR under Criterion 3.

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<b>Date of Report</b>	<b>Author of Report</b>	<b>Summary of Topic, Findings or Opinion</b>
2013-08-23	Circa: Historic Property Development (Sheila McElroy)	Discussion of conclusion with respect to windshield survey of Pebble Beach.
2013-08-29	Page & Turnbull, Inc.	<i>Pebble Beach Historic Context Statement</i> . Concludes that the property “appears to be an extremely rare example of an International style residence in Pebble Beach.”
2013-09-10	Circa: Historic Property Development (Sheila McElroy)	Reiteration of previous evaluations and conclusions, discussion of integrity and current property condition.
2013-11-25	Circa: Historic Property Development (Sheila McElroy)	Response to Meg Clovis memorandum of 2013-07-15.

**2. Adequacy of Historical Context, Analysis and Eligibility**

*Background and Purpose*

The California Environmental Quality Act (CEQA) requires evaluation of project impacts on historic resources, including properties “listed in, or determined eligible for listing in, the California Register of Historical Resources [or] included in a local register of historical resources.” By definition, the California Register of Historical Resources (CRHR) also includes all “properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specified State Historical Landmarks. The majority of formal determinations of NRHP eligibility occur when properties are evaluated by the Office of Historic Preservation in connection with federal environmental review procedures (Section 106 of the National Historic Preservation Act of 1966). Formal determinations of eligibility also occur when properties are nominated to the NRHP, but are not listed due to a lack of owner consent.

The purpose of a Phase I Historic Resources Report is to determine if a property should be considered a historic resource for the purposes of CEQA. In order for it to be considered complete, a Phase I Report should consider the property’s potential eligibility under all pertinent thresholds of significance. For this property, the relevant thresholds are the criteria for listing on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and the Monterey County criteria for the designation of historic resources and districts (Monterey County Code §18.25.070).

Note that Historic Resources Reports, no matter how their findings may be expressed, should be viewed as the opinions of experts, not as authoritative determinations of eligibility. Final determinations of eligibility for the NRHP, CRHR, and local landmark, are the responsibilities of the Keeper of the National Register, the California Historical Resources Commission, and the local agency, respectively. Consequently, it should be understood that the conclusions contained in this report represent the professional opinions of San Buenaventura Research Associates, and are based on the factual data available at

the time of its preparation, the application of the appropriate local, state and federal regulations, and best professional practices.

Any determination of historical significance should be predicated on the description of an appropriate historical context for that property. The context should identify a defined geographical area, key events and developmental themes within that area, the time periods during which these themes and events occurred, and property types associated with the themes and time periods. The identification of contextual themes and time periods allows the subject property to be evaluated within an organized framework, and to compare it to other properties that may also derive significance from these themes. It should be understood that historical context developed to support a Phase I Historic Resources Report is typically not exhaustive, but should be sufficient to answer the research questions as they relate to eligibility under the significance criteria.

None of the previous consultant reports evaluated the property under the NRHP criteria, but rather focused their attentions on the CRHR. This alone might not have been a significant issue in the analysis provided in the reports, had any of the consultants addressed all three of the pertinent CRHR criteria, which very closely parallel the NRHP criteria, and developed context to support a determination of significance against all of the criteria. Instead, all of the consultant reports on the record evaluated the property only in relation to CRHR Criterion 3, and although the context they developed in relation to this criterion is extensive, we find that the lack of context to evaluate the property against the two other criteria to be a flaw common to all of the prior reports. Irrespective of their conclusions, all of the reports share this defect, the consequences of which will be detailed below.

*Historical Context and Evaluation under NRHP Criterion A and CRHR Criterion 1*

None of the consultants who have written opinions with respect to the eligibility of the property have considered its potential significance for its associations with historic events (NRHP Criterion A and CRHR Criterion 1). The question that begs to be answered under these criteria is whether the property is significantly associated with the historical development of Pebble Beach. In the course of evaluating the eligibility of the property against the similar Monterey County Criterion A-6 (The resource or district proposed for designation is the site of an important historic event or is associated with events that have made a meaningful contribution to the nation, State, or community), Circa (2011-12-06) concludes that, “[t]he residence is not the site of an important historic event that made a meaningful contribution to the nation, state, or community.” Circa does not substantiate this conclusion with further discussion, or support it with sources. We note also that the wording of the county criterion differs somewhat from the historical events-derived significance addressed by NRHP Criterion A and CRHR Criterion 1, which are:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history.
  1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

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Based on our reading of the recently-completed *Pebble Beach Historic Context Statement* (Page & Turnbull, 2013-08-29) this property is associated with the “Pebble Beach Post-War (1946-1969)” period and the theme “Modern Architecture Takes Hold,” as defined in the context statement. The context statement documents the relaxation of design controls during this time period that the Del Monte Properties Company exercised previously to define the community’s architectural image as uniformly Mediterranean, to allowing the construction of Modern style buildings. The context refers to both the “modest one-story buildings with a low-slung, horizontal emphasis,” and the “bold modernist designs by prominent architects” that were constructed as a result. Singled out in the context statement as examples of this latter type are the Buckner House by Jon Konigshofer (1948), and the Connell House by Richard Neutra (1958).

The *Pebble Beach Historic Context Statement* further provides guidelines for evaluating properties associated with this contextual theme and time period for eligibility under NRHP Criterion A and CRHR Criterion 1, and the similar Monterey County criteria:

Residential buildings (both single-family and multi-unit) from this period may be significant for associations with post-war planned community development. However, individual buildings are unlikely to qualify under this criterion. Post-war development patterns in California are typically better represented by groups of residences because the street pattern, landscaping and homogeneous, speculative buildings can combine to clearly illustrate this theme. (Page & Turnbull, 2013-08-29: 127)

These statements in the historic context statement tend to not support an argument for significance under NRHP Criterion A and CRHR Criterion 1, but provide weight for eligibility for NRHP Criterion C and CRHR Criterion 3, which will be discussed below. (Page & Turnbull, 2013-08-29: 108-115).

*Historical Context and Evaluation under NRHP Criterion B and CRHR Criterion 2*

Additionally, none of the consultants who have written opinions with respect to the eligibility of the property have considered its potential significance for its associations with historic individuals (NRHP Criterion B and CRHR Criterion 2). Circa (2011-12-06) addressed some of the eligibility issues raised by the otherwise absent analysis under NRHP Criterion B and CRHR Criterion 2 in their discussion of eligibility for local designation, but in a way we believe was substantially flawed.

In the course of evaluating the eligibility of the property against the Monterey County Criterion A-3 (The resource or district proposed for designation was connected with someone renowned), Circa (2011-12-06) concludes that “[t]he residence was the summer/weekend residence of Arthur L. Connell of Los Angeles. Mr. Connell had no particular historic association to Pebble Beach or Monterey County.” However, Circa does not substantiate this conclusion with further discussion, or support it with sources, and none of the other consultants address this question in a way that allows us to compare conclusions backed by factual data and argument. We note also that the wording of the county criterion differs somewhat from the significant individual-derived significance addressed by NRHP Criterion B and CRHR Criterion 2, which are:

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- B. That are associated with the lives of persons significant in our past.
- 2. Associated with the lives of persons important to local, California or national history.

More importantly, the statement by Circa in addressing the potential significance of Connell appears to us to be substantially incorrect on a factual basis. While conducting additional historical research was outside the scope of our review, it was readily determined by SBRA that Arthur and Kathleen Connell lived not in Los Angeles, but in San Marino (having moved there from Pennsylvania in 1946), and that they appear to have made Pebble Beach their primary residence after the completion of their home on Signal Hill Road. It appears they sold the home during by the 1990s, but remained in Pebble Beach until their deaths in 2006 and 2004, respectively.<sup>1</sup>

On the basis of preliminary research, we found that Arthur Lowe Connell was born in Shamokin, Pennsylvania in 1913, to Edward W. and Margaret Lowe Connell, apparently an affluent family. He attended the exclusive Hotchkiss School, a preparatory academy in Connecticut, and continued his education at Princeton University, where he graduated in 1936. He married Kathleen Carpenter the following year. She was born in New Jersey in 1916. The couple settled in South Abington, near Scranton, Pennsylvania, where Arthur Connell worked at a bank. The couple had two daughters.<sup>2</sup>

Arthur Connell turned from banking to being mainly occupied as a photographer beginning in 1944, when he enlisted in the U.S. Navy. He evidently served as a photographer for the Navy aboard a number of ships, including the aircraft carrier USS Lake Champlain. Although this ship never saw combat, it was involved with the demobilization of Allied forces after the war.<sup>3</sup> Six months after Connell was mustered out of the military in December 1945, the family moved to Southern California, purchasing a home in San Marino, an upscale suburb south of Pasadena. In 1948 he purchased the San Marino Camera Shop, a business where he was evidently employed at the time. By the early 1950s he had opened a second photography business, Connell's Camera Shop, in Pasadena. Available records indicate that the Connell family resided in San Marino until the late 1950s, when they commissioned their home in Pebble Beach from architect Richard Neutra.<sup>4</sup>

Connell's work activities during this period are not precisely known, but it is apparent that he continued his pursuit of photography. This occupation is attested to by the house designed for him by Neutra including purpose-built darkrooms, located adjacent to the garage. According to an online biography on the Hotchkiss School Web site, Connell became known for his photographs of automobiles, which he sold to enthusiast magazines. The couple also travelled extensively to Fiji, where they pursued charitable work in education.<sup>5</sup>

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<sup>1</sup> U.S. Social Security Death Index.

<sup>2</sup> 1940 U.S. Federal Census for Lackawanna County, PA.

<sup>3</sup> Pennsylvania Veteran Compensation Applications, World War II, 1950.

<sup>4</sup> City Directories; Los Angeles County Voter Registration Roles; *San Marino Tribune and News*, 5-27-1948, 5-18-1950, 8-16-1956.

<sup>5</sup> [www.hotchkiss.planyourlegacy.org](http://www.hotchkiss.planyourlegacy.org)

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We have also determined that Arthur Connell was closely associated with a circle of important California photographers centered on Monterey Bay, including Ansel Adams, Morley Baer, Beaumont Newhall, Nancy Newhall, and Brett Weston, and through this association became a founding member of the non-profit organization Friends of Photography in Carmel in 1967, with the mission to promote education and exhibition in the photographic arts. The organization remained active in Carmel until the death of Ansel Adams in 1984, when it was relocated to San Francisco and renamed the Ansel Adams Center for Photography. The organization was disbanded in 2001.<sup>6</sup>

Our current knowledge of Connell's career as a photographer, and the complete nature of his relationships with important California photographers, is not sufficient to determine that he was a significant individual; however, it also calls into question the argument that he was a part time residence with "no particular historic association to Pebble Beach or Monterey County." Given the limits of our current knowledge, we believe that further research would be required to support an argument either for or against the eligibility of this property under NRHP Criterion B and CRHR Criterion 2, on the basis of its association with Arthur Connell.

*Architectural Context and Evaluation under NRHP Criterion C and CRHR Criterion 3*

A great deal of effort was expended by the several historic resources consultants writing about this property to describe its architectural style, and to support their arguments for whether other consultants had properly categorized its architectural style classification in their writings. This discussion bears directly on the property's potential eligibility under NRHP Criterion C and CRHR Criterion 3, which are:

- C. That embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

This criterion breaks down into three clauses, both of which provide separate and distinct entry points for significance. The first requires that the property "embody the distinctive characteristics of a type, period, or method of construction." This question relates to whether the property can be regarded as a distinctive example of an architectural style within a defined geography. This particular question has raised perhaps the majority of the disputed points between consultants, the most involved discussion, and the deepest context development. To summarize the controversy briefly, the differences of opinion among professionals reduces essentially to whether the architectural style of the property is best classified as American International Style, as displaying some aspects of the Second Bay Tradition, or as more generally Contemporary or Modern.

The full scope and breadth of these technical arguments does not need to be reiterated here. Suffice to say, particularly when all the filed consultant reports are considered as a whole, we find that the com-

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<sup>6</sup> Warren, Lynne (ed). *Encyclopedia of Twentieth-century Photography, Volume 1*. CRC Press, 2006. p. 568.



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bined effort by the consultants to explain the evolution of California domestic architectural styles in the postwar period to be more than adequate for the purposes of completing a CEQA analysis. It is in fact unusually detailed. That these experts do not entirely agree is not unexpected, nor does it necessarily indicate a flaw in the path of reasoning followed by any of the consultants. Architectural history is not a fixed target; it is a constantly expanding and evolving landscape of knowledge. This is particularly the case for the relatively recent architecture of the postwar period, about which the production of new scholarship is especially active.

This being said, we generally agree with Kirk (2013-03-12) that the architectural style of the property is currently best classified as American International Style, that this stylistic classification is the most supportable by the available data, and is the most suitable basis for an analysis of significance. It should be noted that Kirk (2013-03-12) is an expansion, and to some degree a correction, of the initially stated opinion in Kirk (2010-10-15), which concluded, somewhat confusingly, that the architectural style of the property embodies the “American International, or Contemporary, style and reflects, as well, the design approach associated with the forward-looking second phase of the Bay Area Tradition.” This opinion was restated in Kirk (2013-03-12) as “the Connell house is significant because it embodies the distinctive characteristics of the American International style.” It is difficult to determine if Circa or any of the other respondents would agree or disagree with Kirk (2013-03-12), as their comments filed subsequent to this report’s submission to the County of Monterey (particularly, Circa 2013-09-10 and 2013-11-25) did not address this more recent report.

In any case, in our opinion the property is eligible under NRHP Criterion C and CRHR Criterion 3 as an example of American International Style architecture in Pebble Beach. Further weight to support this conclusion can be derived from the *Pebble Beach Historic Context Statement* (Page & Turnbull, 2013-08-29), which states that the property “appears to be an extremely rare example of an International style residence in Pebble Beach.”

The context further provides guidelines for evaluating properties associated with this contextual theme and time period for eligibility under NRHP Criterion C and CRHR Criterion 3, and the similar Monterey County criteria:

Residential buildings from this period may be significant for their architecture, as expressed by intact stylistic features, forms or construction methods. However, suburban Ranch style buildings are very common in Pebble Beach and California as a whole. Thus, architectural significance is best reserved for buildings that demonstrate particularly strong artistic merit, or that clearly demonstrate the influence of a particular architect or builder. Houses associated with gardens designed by master landscape architects are likely to convey enhanced design merit. Consideration should also be given to examples of styles that are relatively rare as compared to other residential buildings of the period. Resources qualified under this criterion must be excellent examples of types and/or styles, and retain most of their original features. In order to qualify for national, state, or local listing under this criterion, a mid-century residence must be an outstanding example of a Modern architectural style, and should ideally represent the work of a master architect. (Page & Turnbull, 2013-08-29)

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In an effort to support a counterargument that a great many properties in Pebble Beach are representative of this period and style,

A “windshield” survey of Pebble Beach properties was conducted in February 2012. Of the 900 residences constructed between 1944-1962 in Pebble Beach over 525 properties were surveyed within close proximity to the subject property. To compare like-properties the subject property was used as a center point and radiating outward over 525 properties were surveyed and photographed, identifying those that had similar setting/views. (Circa, 2012-07-11)

From which it was concluded,

Therefore, 134 modern residences that share a similar setting are neighboring 1170 Signal Hill. They all contain important characteristics identified with modern residences including the absence of ornament and detail, and the use of technologies, materials and construction techniques of the time. They all architecturally embrace the philosophy of indoor/outdoor living and represent a particularly unique and rarified setting. These 134 residences are only a small portion of a much larger group of modern residences within the Pebble Beach community. (Circa, 2012-07-11)

We find this approach to be overly broad in its definition of the set of properties that should be properly compared with the subject property. We also do not see the relevance of views or settings to determining eligibility. The time period utilized (1944-62) embraces a wide range of approaches to domestic architecture, and while they might all be generally referred to as “modern,” are readily sub-classified into distinct architectural types. We find this approach to be especially questionable, given that much of the debate over the significance of the property has been focused on precisely the issue of which architectural subtype the property most nearly represents.

Consequently, we do not see how this survey adds usefully to the significance discussion. Further, we note that according to the NRHP standards “it is not necessary to evaluate the property in question against other properties if... it clearly possesses the defined characteristics required to strongly represent the context.” We note that the question of scarcity may, however, have a bearing on eligibility under County of Monterey Criterion B-2, as discussed below. (National Register Bulletin 15)

The second clause of NRHP Criterion C and CRHR Criterion 3 states that a property may be eligible for the NRHP or CRHR as “the work of a master.” That Richard Neutra should be regarded as a master architect, particularly as considered within the context of the architectural development of California, is indisputable, and no argument to the contrary appears to have been advanced by any of the consultants of record on this property.

The question of which properties designed by a master should be eligible on this basis alone is not a particularly straightforward one to answer. *National Register Bulletin 15*, the principal guideline for evaluating significance for the NRHP, states: “... a property is not eligible as the work of a master, however, simply because it was designed by a prominent architect.” This statement is central to some of the differences of opinion between experts. As the bulletin further explains, the “... property must express a particular phase in the development of the master’s career, an aspect of his or her work, or a

particular idea or theme in his or her craft.” Unfortunately the bulletin does not provide further guidance on how an evaluator should distinguish between works that do or do not express an aspect, idea or theme in a designer’s work.

If we are to assign any importance to the admonition that “a property is not eligible as the work of a master... simply because it was designed by a prominent architect,” an argument to support eligibility of any given design by Neutra as “the work of a master” should be supported by scholarship that establishes its position within the body of his work. It would not require, as Circa suggests (2012-05-18; 2013-11-25), that the property display a specific set of design features that were appearing frequently in Neutra’s designs during this period. Works by great architects typically do not, in our opinion, follow such a constricted formula, and their approach to any given project can provide important insights into their thought processes, even (if not especially) when they vary from site to site and client to client.

Yet it appears that the currently available scholarship required to support the eligibility of the property as an important design or as expressing a particular idea or theme within the body of Neutra’s work is incomplete. The evidence submitted by a Neutra scholar in Lamprecht (2012-02-01) argues that the property “exemplifies Neutra’s signature trademarks,” particularly as his buildings were designed to relate to their sites, his use of asymmetry, volumes, planes, and contrasting surface treatments. This seems clear to us as well. This sentiment is generally echoed by Hines (2011-16-16), who calls it “an important work that needs protection, support, and appreciation,” and by the architect’s son and fellow architectural practitioner, Dion Neutra (2012-01-23), who supplies the opinion that “the house exemplifies my father’s approach to design.”

The ideas and themes found in this property were revisited by the architect throughout his career. It is unclear to us whether these themes and ideas form a sufficient basis to find that it meets the test for NRHP and CRHR eligibility solely on the basis of it being “the work of a master.” Making this finding seems to demand a somewhat higher level of evidence than has been presented. It is entirely possible that additional scholarship would support eligibility on this basis, but we are less than fully persuaded that the necessary evidence is on the record at the current time.

NRHP Criterion D and CRHR Criterion 4 pertain to archeological resources, and consequently do not apply to this evaluation.

*Summary of Significance Under the NRHP and CRHR Criteria*

As discussed above, the context prepared by previous consultant reports provides a substantial basis for determining the significance of the property under NRHP Criterion C and CRHR Criterion 3, but little or no basis for determining eligibility under NRHP Criterion A and CRHR Criterion 1, or NRHP Criterion B and CRHR Criterion 2.

In our opinion, the property is eligible under NRHP Criterion C and CRHR 3 as embodying the characteristics of postwar American International Style architecture in Pebble Beach. It does not appear to be eligible under NRHP Criterion A and CRHR Criterion 1 for its association with the historical development of Pebble Beach during the postwar period. The property may be eligible under NRHP Criterion B and

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CRHR Criterion 2, for its association with Arthur L. Connell, but additional research would be required to support eligibility on this basis.

*County of Monterey Criteria of Significance*

Section 18.25.070 of the Monterey County Code sets forth the following “review criteria” for the purposes of determining if “[a]n improvement, natural feature, or site may be designated an historical resource and any area within the County may be designated a historic district.” The resource is eligible if it “meets the criteria for listing on the National Register of Historic Places, the California Register of Historic Resources, or one or more of the following conditions are found to exist:”

A. Historical and Cultural Significance.

1. *The resource or district proposed for designation is particularly representative of a distinct historical period, type, style, region, or way of life.*

Discussion: In our opinion, the property is a fine representative example of the American International Style constructed in Pebble Beach. While further discussion of this eligibility question can be found under NRHP Criterion C and CRHR Criterion 3, the plain language of the Monterey County criterion (particularly representative of a distinct historical period, type, style) appears to be more broadly inclusive than the otherwise similar NRHP and CRHR criteria.

2. *The resource or district proposed for designation is, or contains, a type of building or buildings which was once common but is now rare.*

Discussion: It appears that buildings of this style and period in Pebble Beach were never common.

3. *The resource or district proposed for designation was connected with someone renowned.*

Discussion: Data to support the significance of Arthur Connell is presently insufficient to determine if he should be regarded as renowned within the Pebble Beach area. See further discussion under NRHP Criterion B and CRHR Criterion 2.

4. *The resource or district proposed for designation is connected with a business or use which was once common but is now rare.*

Discussion: This property does not appear to be associated with a particular business.

5. *The resource or district proposed for designation represents the work of a master builder, engineer, designer, artist, or architect whose talent influenced a particular architectural style or way of life.*

Discussion: The property was designed by Richard J. Neutra, who is widely regarded as one of the most influential Modern architects in the history of 20th century architecture in California. See further discussion under NRHP Criterion C and CRHR Criterion 3. The wording of this criterion does not appear to require that the property meet the more stringent “work of the master”

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test found in the NRHP and CRHR in order to derive significance from its association with the architect.

6. *The resource or district proposed for designation is the site of an important historic event or is associated with events that have made a meaningful contribution to the nation, State, or community.*

Discussion: This property appears to be only generally associated with the postwar development of Pebble Beach and played no known notable role in that development. See further discussion under NRHP Criterion A and CRHR Criterion 1.

7. *The resource or district proposed for designation has a high potential of yielding information of archaeological interest.*

Discussion: This criterion is not applicable to this analysis.

B. Historic, Architectural, and Engineering Significance.

1. *The resource or district proposed for designation exemplifies a particular architectural style or way of life important to the County.*

Discussion: The property is a fine representative example of the American International Style constructed in Pebble Beach. See further discussion under NRHP Criterion C and CRHR Criterion 3.

2. *The resource or district proposed for designation exemplifies the best remaining architectural type of a community.*

Discussion: It is presently unclear if the property represents the best remaining example of its architectural type in Pebble Beach.

3. *The construction materials or engineering methods used in the resource or district proposed for designation embody elements of outstanding attention to architectural or engineering design, detail, material or craftsmanship.*

Discussion: The property is a fine representative example of the American International Style constructed in Pebble Beach, designed by Richard J. Neutra, who is widely regarded as one of the most influential Modern architects in the history of 20th century architecture in California. While further discussion of this eligibility question can be found under NRHP Criterion C and CRHR Criterion 3, the plain language of the Monterey County criterion (embody elements of outstanding attention to architectural or engineering design) appears to be more broadly inclusive than the otherwise similar NRHP and CRHR criteria.

C. Community and Geographic Setting.

1. *The proposed resource materially benefits the historic character of the community.*

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Discussion: The plain language of this criterion is difficult to interpret, but it appears to relate to properties that make notable contributions to a neighborhood, district, or streetscape. If this is the proper interpretation of the criterion, then this property does not appear to qualify for designation on this basis.

2. *The unique location or singular physical characteristic of the resource or district proposed for designation represents an established and familiar visual feature of the community, area, or county.*

Discussion: The plain language of this criterion is difficult to interpret, but similar to Criterion C-1, above, it appears to relate to properties that make notable contributions to a neighborhood, district, or streetscape. If this is the proper interpretation of the criterion, then this property does not appear to qualify for designation on this basis.

3. *The district is a geographically definable area, urban or rural possessing a significant concentration or continuity of site, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development.*

Discussion: This criterion is not applicable to this analysis.

4. *The preservation of a resource or resources is essential to the integrity of the district.*

Discussion: This criterion is not applicable to this analysis.

*Action of the Historic Resources Review Board*

The Monterey County Historic Resources Review Board (HRRB) held a public hearing on August 4, 2011 to consider the historical significance of this property. After taking public testimony, the HRRB adopted a motion finding,

... that the Richard Neutra residence in question does appear to be significant at the local level under Criterion 3 of the California Register of Historical Resources for, among other aspects, its architecture which embodies the distinctive characteristics of the American International or Contemporary style and reflects the design approach associated with the forward-looking second phase of the Bay Area Tradition. (Historic Resources Review Board, 2011-08-04)

The HRRB did not discuss or render any opinion with respect to the property's eligibility under the significance criteria contained in Monterey County Code Section 18.25.070.

*Analytical Flaws Noted in Prior Reports and Conclusions*

In reviewing the public record for this project, we identified a number of statements in several documents that in our opinion require correction. Whether or not they have a direct bearing on conclusions, these points should be addressed for purposes of clarifying the standards of analysis.

Circa (2011-12-06, 2012-05-18, 2013-09-10) questions whether this property is, in fact, the work of Richard Neutra:

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The residence was designed by the prominent southern California architectural firm of Richard Neutra, however, there is no evidence that Neutra himself designed the residence or even approved the [plan] set. What appears to be the original project plans (on file) are not signed by Neutra, or anyone from the firm, therefore the plans cannot be presumed to be approved (or not approved) by Neutra [sic].

In our opinion, the question of precisely who designed any given project can be debated for works produced by a non-sole practitioner architectural firm, generally without fruitful results. Unless it can be documented that the firm employed principal designers who worked with a free hand under the named practitioner, it must be assumed that the designs from that office are the work products of the named practitioner. It certainly cannot be safely argued that any plans that do not bear the architect's signature were designed by someone else, and it is even less safe to suggest that the architect was uninvolved with the design to the degree that it might have been produced by others in his office entirely without his review and approval. In this instance, a documented planning meeting between the Connells and Neutra seems to further belie that argument<sup>7</sup>. Consequently, we believe that Circa's conjecture is lacking in support and should not be considered useful evidence bearing on the significance of this property.

In Chattel (2012-04-19) the argument is made that "[t]here is no 'local level' of eligibility for the California Register, with the exception of criterion 1." This assertion is not correct. California Office of Historic Preservation *Technical Assistance Bulletin 6* (revised 2011) states that a "historical resource must be significant at the local, state, or national level, under one or more of the following four criteria."

In Kelley (2013-03-07), the statement is made that "the building is only minimally visible from the public right of way," and further that it was even less visible prior to the relatively recent removal of nearby trees. This statement is used to support the concept that "public visibility is an important consideration in CEQA," and accordingly to question whether the loss of the property would be "tangible." We do not agree that the significance of a historic property, or the impact of its demolition, in any way relies upon its visibility to the public. We do not believe that any such principle exists in CEQA or in practice, for purposes of historic resources analysis.

Several commenters (Circa: 2012-05-18, 2013-09-10) refer to the "condition" of the subject property, and/or to various deteriorated features of the property, in a manner that appears to suggest that condition has a bearing on eligibility, or is in some way related to the concept of integrity. As described in the following section of this report, integrity is a closely defined term in historic resources, and is broken down into seven defined "aspects" for purposes of analysis. Condition is not one of these aspects, and should not be considered unless deterioration has led to a significant loss of historic fabric, which does not appear to be the case here. We note that condition may have a bearing on assessing the feasibility of rehabilitation or restoration of a deteriorated historic resource, but that this analysis would properly take place within an EIR, where feasibility issues can be explored together with project impacts and alternatives.

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<sup>7</sup> Hines, Thomas S. *Richard Neutra and the Search for Modern Architecture*. University of California Press, 1994. p. 268-9

We note also that several commenters and consultants came to what we consider to be ambiguous conclusions with respect to the property's significance, which we believe are predicated on a faulty approach to the standards of evaluation. In particular, Circa (2013-11-25) argues that the property "might only marginally be historic and is dependant [sic] on Neutra's notoriety rather than its architectural distinction." Elsewhere, Circa (2011-04-07, 2013-09-10) states this argument somewhat differently: "While technically of some significance for its association to Neutra, the building is only marginally so." First, we cannot endorse the concepts of "marginal" or "some" significance. Evaluating a property under the significance criteria requires a clear determination of whether the property is or is not significant under the criteria. Second, we do not believe that the property should be considered significant for the architect's notoriety (i.e., being famous or well known), but rather as an example of a building designed in an architectural style for which he was a prominent and important exponent.

### 3. Integrity

According to the NRHP standards, in order for a property that is found to be significant under one or more of the criteria to be considered eligible for listing, the "essential physical features" that define the property's significance must be present. The standard for determining if a property's essential physical features exist is known as *integrity*, which is defined for the NRHP as "the ability of a property to convey its significance." The CRHR defines integrity as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance." (National Register Bulletin 15; California OHP Technical Assistance Bulletin 6)

For purposes of both the NRHP and CRHR, an integrity evaluation is broken down into seven "aspects." It is not required that the significant property possess all aspects of integrity to be eligible; depending upon the NRHP and CRHR criteria under which the property derives its significance, some aspects of integrity might be more relevant than others. For example, a property nominated under NRHP Criterion A and CRHR Criterion 1 (events), would be likely to convey its significance primarily through integrity of location, setting and association. A property nominated solely under NRHP Criterion C and CRHR Criterion 3 (design), would usually rely primarily upon integrity of design, materials and workmanship. While the NRHP guidelines and the CRHR regulations include similar language with respect to the aspects of integrity, the latter guidelines also state "it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." (National Register Bulletin 15; California OHP Technical Assistance Bulletin 6)

The aspects of integrity are defined below, and are followed by a discussion of each integrity aspect in relation to this property.

1. Location: The place where the historic property was constructed or the place where the historic event occurred.



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The property retains its integrity of location. The building has not been moved.

2. Design: The combination of elements that create the form, plan, space, structure, and style of a property.

The *Pebble Beach Historic Context Statement* provides additional guidance with respect to the “minimum eligibility requirements” for judging the integrity of properties from this time period:

- Clear example of residential architecture from this period.
- Retains original form and roofline.
- Substantially retains the original pattern of windows and doors
- Retains most of its original ornamentation (if applicable).
- Replacement of doors and windows can be acceptable as long as they conform to the original pattern and size of the openings.

As well as the following “other integrity considerations” for evaluating these properties:

- Rear and side additions should be carefully evaluated. Additions that compromise a building’s form and scale are not acceptable.
- The retention of original windows greatly enhances integrity of materials. However, far more important is that the building retains its original pattern of windows, and that any replacement windows(s) are located within the original frame openings.
- The presence of original site or landscape features enhances a property’s historic character. Properties that retain elements such as designed plantings, walls, walkways, patios, and/or benches are more likely to qualify for individual listing in the California or National Register. (Page & Turnbull, 2013-08-29: 133-34)

The elements creating the form and plan, and communicating the architectural style of the property are substantially intact. The principal features of the building describing its style are: the irregular plan organized around a central courtyard, projecting, flat rooflines with deep eaves and prominent fascias, contrasting surface treatments (mainly stucco, wood, and masonite), projecting rafter tails, and windows organized into bands. The plan of the building was slightly altered in 1993, with a 220 square foot addition located at the southwestern corner of the house, near the garage, converting a former small exterior courtyard to interior space. The impact of this addition on the overall design of the house is relatively minor, particularly as it encompassed a space previously enclosed on the western elevation by a screen wall. The most apparent alteration is the replacement of jalousie windows (floor-to-ceiling in four bays, and above masonite panels to ceiling in four bays) to single, fixed lights on the ground floor western elevation. Four windows organized in a band on the southern end of the second floor appear to be replacement units within original window openings. Each window currently consists of single casement to the left of a single, fixed

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light. This appears to be essentially a reversal of the casement configuration indicated on the 1958 architectural plans. The dates of these alterations are not known.

3. Setting: The physical environment of a historic property.

The setting of the house within the dune environment of the Pebble Beach single family residential neighborhood remains fundamentally unaltered. The property continues to enjoy the unobstructed views of the Pacific Ocean that it was designed to capitalize upon.

4. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

To the degree that the property retains its integrity of design, it also largely retains its integrity of materials. Changes to window stops and frames, which were noted by several reviewers, are relatively minor materials integrity issues, as these materials are not key to interpreting the style of the building.

5. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period of history or prehistory.

Workmanship is a relatively more important aspect of integrity for properties that derive their significance from their craft or method of construction. This property does not appear to be notable for these characteristics.

6. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

The overall historic character of the property remains largely intact.

7. Association: The direct link between an important historic event or person and a historic property.

Association is a relatively more important aspect of integrity for properties that derive their significance from historic events, and is said to be retained if the property is "the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer." This building was constructed as a single family residence, and it has not been converted to another use. Consequently, it retains its integrity of association with its historic use.

In our opinion, the property retains sufficient integrity to convey its significance associations under NRHP Criterion C and CRHR Criterion 3; and potentially under NRHP Criterion B and CRHR Criterion 2.

The Monterey County ordinance does not include specific integrity criteria, but in practice, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation* is employed by staff and the Historic Resource Review Board (HRRB) to assess the integrity of potentially eligible historical resources. This is the same standard of evaluation utilized for the NRHP and CRHR. Consequently, the above discussion of integrity for the NRHP and CRHR applies to local eligibility, and we consequently conclude that the property retains sufficient integrity to convey its significant associations under Monterey County criteria A-1, A-5, B-1 and B-3; and potentially under criteria A-3 and B-2.

#### 4. Adverse Impacts on Historic Resources

According to the Public Resources Code, “a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment.” The Public Resources Code broadly defines a threshold for determining if the impacts of a project on an historic property will be significant and adverse. By definition, a substantial adverse change means, “demolition, destruction, relocation, or alterations,” such that the significance of an historical resource would be impaired. For purposes of NRHP eligibility, reductions in a property’s integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. (PRC §21084.1, §5020.1(6))

Further, according to the CEQA Guidelines, “an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources [or] that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.” (CCR §15064.5(b)(2))

By operation of CEQA, the proposed demolition of the subject property would constitute an adverse impact on a historic resource. In our opinion, the absolute loss of a historic property should generally be regarded as an adverse environmental impact that cannot be mitigated to a less than significant level.

#### 5. Mitigation of Adverse Impacts

##### *Background*

A principle of environmental impact mitigation is that some measure or combination of measures may, if incorporated into a project, serve to avoid or reduce significant and adverse impacts to a historic resource. Per the CEQA Guidelines, a lead agency is responsible for the identification of “potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource.” (CCR §15126.4 (b)(4))

In reference to mitigating impacts on historic resources, the CEQA Guidelines state:

Generally, a project that follows the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource. (CCR §15126.4 (b)(3))

These standards, developed by the National Park Service, represent design guidelines for carrying out historic preservation, restoration and rehabilitation projects. The Secretary’s Standards and the support-

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ing literature describe historic preservation principles and techniques, and offers recommended means for carrying out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources. Adhering to the Standards is the only method described within CEQA for presumptively reducing project impacts on historic resources to less than significant and adverse levels. The demolition of a historic property cannot be viewed as conforming with the *Secretary of the Interior's Standards*.

Further, the usefulness of documenting a lost historic resource, through photographs and measured drawings, as mitigation for its demolition, is limited by the CEQA Guidelines, which state:

In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. (CCR §15126.4 (b)(2))

Implied by this language is the existence of circumstances whereby documentation may mitigate the impact of demolition to a less than significant level. However, the conditions under which this might be said to have occurred are not described in the Guidelines. It is also noteworthy that the existing CEQA case law does not appear to support the concept that the loss of a historic resource can be mitigated to less than adverse impact levels by means of documentation or commemoration. (*League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* [1997] 52 Cal. App. 4th 896; *Architectural Heritage Association v. County of Monterey* [2004] 19 Cal. Rptr. 3d 469)

Taken in their totality, the CEQA Guidelines require a project that will have potentially adverse impacts on historic resources to conform to the *Secretary of the Interior's Standards*, in order for the impacts to be presumptively mitigated to below significant and adverse levels. However, CEQA also mandates the adoption of feasible mitigation measures that will reduce significant adverse impacts, even if the residual impacts after mitigation remain significant. Means other than the application of the Standards would necessarily be required to achieve this level of mitigation. In determining what type of additional mitigation measures would reduce impacts to the greatest extent feasible, best professional practice dictates considering the level of eligibility of the property, as well as by what means it derives its significance.

Mitigation programs for impacts on historic resources tend to fall into three broad categories: documentation, design and interpretation. Documentation techniques involve the recordation of the site according to accepted professional standards, such that the data will be available to future researchers, or for future restoration efforts. Design measures could potentially include direct or indirect architectural references to a lost historic property, e.g., the incorporation of historic artifacts, into the new development, or the relocation of the historic property to another suitable site. Interpretative measures could include commemorating a significant historic event or the property's connection to historically significant themes.

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*Project Mitigation*

It should be noted that mitigation for historic resources impacts is only appropriate and mandated by CEQA when the property is determined to be a historic resource, and when the resource will be materially impaired by a proposed project. This point bears addressing, as several of the consultants and others who have commented on this project have both argued that the property is not (or may not be) a historic resource, and at the same time, that proposed mitigation measures may address the impacts of demolition. For example:

While there is considerable question as to whether the residence meets any criteria as a historic resource the owner has agreed to mitigation measures in event there may be some assemblage of historic significance. To date there is no written evidence suggesting the proposed mitigations are inadequate under CEQA. (Circa, 2013-11-25)

This and other similar statements (Bridges: 2012-08-09, 2012-12-13) present logical inconsistencies with respect to the significance of the property and the need for mitigating its proposed demolition. Simply stated, if the property is not a historic resource, then by definition its demolition would not constitute a substantial adverse change, and mitigation would be unnecessary, if not inappropriate.

Further, the argument advanced by Burns (2011-02-10) that the demolition of a historic resource can be conformed to the Secretary's Standards is plainly contrary to accepted practice in historic preservation. The Standards do not anticipate the demolition of historic properties, but rather were created to guide their responsible rehabilitation and reuse. The term rehabilitation itself is defined in the supporting literature as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."

We also note that a proposal to relocate a historic building subject to demolition is not typically regarded as mitigation, unless a relocation site has been identified prior to impact analysis, and this as well as the relocation method are incorporated into the project description. Certainly conducting a "feasibility study of relocation" (Circa 2011-04-07; Bridges 2011-12-15) should not be regarded as more than speculative impact mitigation, as it guarantees nothing more tangible than an investigation. Further we find that the proposal to store "historic character defining features for possible future use and/or study" and to "include character defining features and photo documentation in public display within context of Pebble Beach development history" (Circa 2011-04-07) to be of little tangible value in offsetting the loss of the historic resource.

Accordingly, the mitigation measures we propose are oriented towards documentation.

- A. In consultation with the Count of Monterey, a historic preservation professional qualified in accordance with the *Secretary of the Interior's Standards* shall be selected to complete a Documentation Report on the property. The property shall be documented with archival quality photographs of a type and format approved by the County of Monterey. This documentation, along with historical background for this property, shall be submitted to an appropriate repository approved by the

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County of Monterey. The documentation reports shall be completed and approved by the County of Monterey prior to the issuance of demolition permits.

In our opinion, the residual impact after mitigation would remain significant and adverse.

**6. Qualifications**

This report was prepared by San Buenaventura Research Associates (SBRA) of Santa Paula, California (Judy Triem, and Mitch Stone, Principals). Since 1980, SBRA has supplied Historian and Architectural Historian historic resources expertise to public and private sector clients, in accordance with the *Secretary of the Interior's Professional Qualifications*. SBRA specializes in the production of historic resources evaluations for compliance with state and federal environmental requirements, historic property surveys, and environmental documents to support historic preservation planning efforts. A complete current Statement of Qualifications can be downloaded at [www.historicresources.com](http://www.historicresources.com).



Photo 1. Oblique aerial, from west. [Google Maps, nd]



Photo 2. Northern and eastern elevations. [1-31-2014]



Photo 3. Northern elevation. [1-31-2014]



Photo 4. Northern and western elevations. [1-31-2014]



Photo 5. Western elevation, northern half. [1-31-2014]



Photo 6. Western elevation, southern half. [1-31-2014]





Photo 7. Southern elevation. [1-31-2014]



Photo 8. Eastern elevation. [1-31-2014]